

**Richards, Gabrielle D. (Gabby) (Perkins Coie)**

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**From:** Dawn\_Stephens@ord.uscourts.gov  
**Sent:** Wednesday, May 13, 2015 3:08 PM  
**To:** Dee Syfert  
**Cc:** Knebel, Deborah (Perkins Coie); Richards, Gabrielle D. (Gabby) (Perkins Coie)  
**Subject:** Re: Case 3:14-cv-01836-MO: LNV Corporation v. Subramaniam

Please confer with opposing counsel to come up with new dates and a motion to extend time will need to be submitted.  
Thanks

Dawn L. Stephens  
Courtroom Deputy for Judge Michael W. Mosman  
United States District Court for the District of Oregon  
(503) 326-8024  
Dawn\_Stephens@ord.uscourts.gov

“By failing to prepare, you are preparing to fail.”  
— Benjamin Franklin[[goodreads.com](http://goodreads.com)]

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From: Dee Syfert <deesyfert@gmail.com>  
To: "Richards, Gabrielle D. (Gabby) (Perkins Coie)" <GRichards@perkinscoie.com>.  
Cc: "Dawn\_Stephens@ord.uscourts.gov" <Dawn\_Stephens@ord.uscourts.gov>, "Knebel, Deborah (Perkins Coie)" <DKnebel@perkinscoie.com>  
Date: 05/13/2015 09:34 AM  
Subject: Re: Case 3:14-cv-01836-MO: LNV Corporation v. Subramaniam

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Ms. Stephens and Ms. Richards,

I agree that we need time for discovery. The deadline for discovery needs to be set out far enough to allow the normal amount of time that we would have have if I not had these medical problems.

Denise Subramaniam  
971-275-7618

On Tue, May 12, 2015 at 3:22 PM, Richards, Gabrielle D. (Gabby) (Perkins Coie) <[GRichards@perkinscoie.com](mailto:GRichards@perkinscoie.com)> wrote:  
Thank you.

**Gabrielle D. Richards | Perkins Coie LLP**

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**From:** Dawn\_Stephens@ord.uscourts.gov [mailto:Dawn\_Stephens@ord.uscourts.gov]  
**Sent:** Tuesday, May 12, 2015 2:15 PM  
**To:** Richards, Gabrielle D. (Gabby) (Perkins Coie)  
**Cc:** Dee Syfert; Knebel, Deborah (Perkins Coie)

**Subject:** RE: Case 3:14-cv-01836-MO: LNV Corporation v. Subramaniam

Good Afternoon,  
Discovery was set to complete in April. The deadline needed to be moved. If the parties need additional time. Please meet confer and submit a motion to extend time. Thank you.

Dawn L. Stephens  
Courtroom Deputy for Judge Michael W. Mosman  
United States District Court for the District of Oregon  
(503) 326-8024  
[Dawn\\_Stephens@ord.uscourts.gov](mailto:Dawn_Stephens@ord.uscourts.gov)

Until one has loved an animal, a part of one's soul remains unawakened. ~Anatole France

-----"Richards, Gabrielle D. (Gabby) (Perkins Coie)" <[GRichards@perkinscoie.com](mailto:GRichards@perkinscoie.com)> wrote: -----

To: Dee Syfert <[deesyfert@gmail.com](mailto:deesyfert@gmail.com)>, "Dawn\_Stephens@ord.uscourts.gov" <[Dawn\\_Stephens@ord.uscourts.gov](mailto:Dawn_Stephens@ord.uscourts.gov)>  
From: "Richards, Gabrielle D. (Gabby) (Perkins Coie)" <[GRichards@perkinscoie.com](mailto:GRichards@perkinscoie.com)>  
Date: 05/12/2015 01:25PM  
Cc: "Knebel, Deborah (Perkins Coie)" <[DKnebel@perkinscoie.com](mailto:DKnebel@perkinscoie.com)>  
Subject: RE: Case 3:14-cv-01836-MO: LNV Corporation v. Subramaniam

Ms. Stephens,

Thank you for the Court's prompt action regarding Ms. Subramaniam's motion and the deadlines set forth in the May 11 order. I note that the deadline for completion of discovery is now June 8, 2015. I just want to bring to the Court's attention that this deadline does not appear to contemplate time for discovery to take place.

Sincerely,

**Gabrielle D. Richards | Perkins Coie LLP**

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